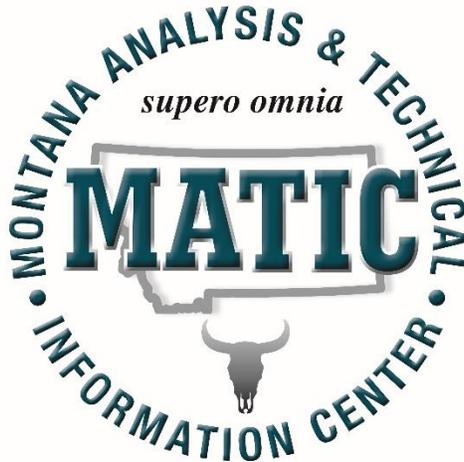


EXHIBIT P

MONTANA ANALYSIS & TECHNICAL INFORMATION CENTER



**MONTANA DEPARTMENT OF JUSTICE
DIVISION OF CRIMINAL INVESTIGATION**

MONTANA NARCOTICS REPORT 11 MARCH 2021

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(U) SCOPE

(U//FOUO) This Montana Analysis & Technical Information Center (MATIC) report is intended for law enforcement agencies and public safety officials involved in combatting drug trafficking in Montana. This report provides general information on trends regarding drug, violent, and property crime in Montana, drug trafficking organization operations and the origin of the narcotics transported into the state, drug purity, and generalized financial costs associated with enforcing drug laws in Montana.

(U) SOURCE SUMMARY AND KEY ASSUMPTIONS

(U//FOUO) The information presented in this report is based off reporting from the Montana Board of Crime Control (MBCC), the Montana Department of Justice-Division of Criminal Investigation (DCI) Narcotics Bureau, the Rocky Mountain High Intensity Drug Tracking Area (RMHIDTA), and the Drug Enforcement Administration (DEA).

(U//FOUO) The most recent data available on crime statistics from the MBCC is 2019, although 2020 statistics will likely be available in the coming weeks. DCI's information is year-to-date, yet it is generalized. The most recent data from MHP is as of 2020. The information used from RMHIDTA is from August 2020, but the majority of the information is circa 2019. The information used from the DEA is from 2021, but most of the information is circa 2019.

(U//FOUO) Methamphetamine (meth), heroin, fentanyl, opioids, and cocaine are the main focus of this report. Note that while these agencies presumably receive and keep up-to-date information on drug and crime trends, there is always a processing and analysis period before agencies can officially release finalized numbers on trends. The official drug and crime statistics presented in this report are one or more years behind, which undoubtedly poses information gaps, since part of the MATIC's analysis relies on the assumption that drug and crime statistics for 2020 and 2021 are likely on the same trajectory from previous years. The MATIC attempts to address these information gaps by incorporating general reporting from DCI Agents who have direct access and up-to-date, tactical knowledge of Montana's current drug trends. As such, the MATIC's judgments in this report rely heavily on DCI reporting.

(U) KEY JUDGMENTS

- (U//FOUO) The MATIC assesses it is likely^a that the overall increasing violent crime^b rates strongly coincide with the overall narcotics violations rates. The MATIC makes this assessment with medium confidence^c based on reporting from the MBCC, and RMHIDTA, and DCI. However, because the MATIC does not possess 2020 or 2021 crime statistics from MBCC and RMHIDTA, the MATIC cannot render a judgment higher than medium confidence.

^a (U) Refer to Appendix A for expressions of likelihood or probability.

^b (U) Refer to Appendix D for the types of crimes defined under crimes against persons and property.

^c (U) Refer to Appendix B for confidence in sources supporting assessments and judgments.

- (U//FOUO) The MATIC assess it is nearly certain that the vast majority of meth, heroin, opioids, fentanyl, and cocaine trafficked in Montana is manufactured abroad and smuggled through the southwestern border—particularly in Arizona and California—before their eventual distribution and use throughout the state. Meth, heroin, opioids, and fentanyl are manufactured in Mexico by Mexican Transnational Criminal Organizations (TCOs) while cocaine is produced in South American countries—Bolivia, Colombia, and Peru—and subsequently smuggled through the southwestern border. The MATIC makes this assessment with high confidence based on substantial reporting and accounts from DEA, DCI, and RMHIDTA.
- (U//FOUO) The MATIC assess it is nearly certain that TCOs have an intermittent presence in Montana but pose a low threat to Montana communities. The MATIC further assesses it is nearly certain that TCOs rely heavily on regional and local DTOs to traffic narcotics within the state on their behalf. The MATIC makes this assessment with high confidence based on reporting from DCI, RMHIDTA, and DEA.
- (U//FOUO) The MATIC assesses it is nearly certain that the purity of meth in Montana is at least 95 percent and has recently increased to 96-99 percent purity in certain areas, while the purity of heroin and cocaine likely varies, as these two drugs are not always tested for purity. The MATIC makes this assessment with high confidence based on reporting from DCI and DEA.
- (U//FOUO) The financial costs of enforcing drug laws and combatting drug related crime have increased overall for the DCI Narcotics Bureau, although the exact amount has not been determined. Reasons for these cost increases include extra hours and resources required to conduct drug investigations which involve tracing drugs with out-of-state origins, a rise in the number of DTOs operating in Montana, a lack of grant funding matches, and increases in quantities purchased during drug investigations.

(U) ASSOCIATIONS BETWEEN DRUG, VIOLENT, AND PROPERTY CRIMES

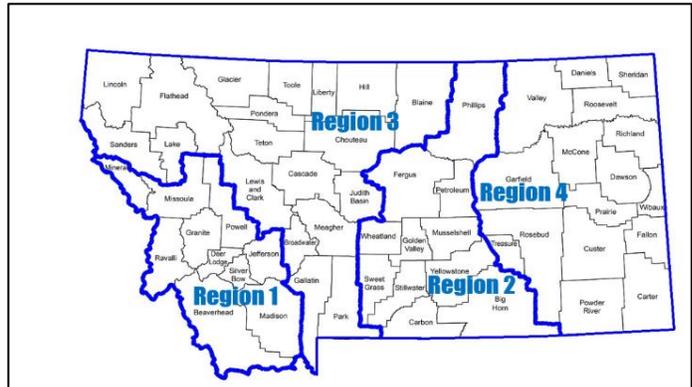
(U//FOUO) The MATIC assesses it is likely that the overall increasing violent crime rates strongly coincide with the overall narcotics violations rates. The MATIC makes this assessment with medium confidence based on reporting from the MBCC, and RMHIDTA, and DCI. However, because the MATIC does not possess 2020 or 2021 crime statistics from MBCC and RMHIDTA, the MATIC cannot render a judgment higher than medium confidence.

(U//FOUO) For the time period of 2015 through 2019, Montana's population steadily grew roughly 10,000 people per year, or about one percent.^{d,1} During this period, the average rate of crimes against persons increased by 7.6 percent while the average rate of crimes against property decreased by 13.9 percent.² At the same time, narcotics violations in Montana have increased by an average rate of 10.1 percent,³ a statistic which includes substantial increases in Montana drug seizures—particularly meth, pharmaceuticals, and fentanyl. These increases were accompanied by increases in overdoses from meth, heroin, opioids, pharmaceuticals, and fentanyl/synthetic narcotics.⁴ Generally, the MATIC is aware that

^d (U) Refer to Appendix C for all charts and tables.

drug crime typically involves crimes against persons and property (e.g. drug users committing assaults, robberies, or burglaries to finance drug purchases), but property crime rates do not seem to reflect that information in reporting between 2015-2019.

(U//FOUO) Because comprehensive data is not yet available for 2020 and year-to-date 2021, the MATIC surveyed DCI Narcotics Bureau Regions 1 through 4 to gain a better understanding of narcotics trends in Montana. General reporting from the DCI Regions is consistent with the above statistics except for property crime. Please note that not all respondents were able to report on all issues or caveats.



(U) MT DCI Narcotics Bureau Regions 1 through 4.
Source: dojmt.gov/enforcement/narcotics-bureau/

(U//FOUO) In DCI Region 1, DCI assessed the following:

- (U//FOUO) It is very common while conducting a dangerous drug investigation to receive information identifying that same suspects' involvement in crimes related to violence or property.⁵

(U//FOUO) In DCI Region 2, DCI assessed the following:

- (U//FOUO) Within the Region, there has been an increase in violent and property crimes. Meth remains the most significant drug threat, followed by heroin. Both drugs are a substantial concern for public health and continue to negatively impact local communities. Montana has seen a significant increase in heroin-related overdose deaths, some of which may be related to the recent trend of heroin being laced with fentanyl.⁶
- (U//FOUO) Counterfeit pills containing fentanyl is an emerging threat. (More on this in the following section.)⁷

(U//FOUO) In DCI Region 4, DCI assessed the following:

- (U//FOUO) Drug trafficking is a major factor in both property and violent crime incidents. Whenever drugs are readily available in eastern Montana, property crime and violence-related calls for service tend to increase for local law enforcement agencies. As drug availability decreases, so do property crimes and violence.⁸

(U) DRUG TRAFFICKING IN MONTANA

(U//FOUO) The MATIC assess it is nearly certain that the vast majority of meth, heroin, opioids, fentanyl, and cocaine trafficked in Montana is manufactured abroad and smuggled through the southwestern border—particularly in Arizona and California—before their eventual distribution and use throughout the state. Meth, heroin, opioids and fentanyl are manufactured in Mexico by Mexican TCOs while cocaine is produced in South American countries—Bolivia, Colombia, and Peru—and subsequently smuggled through the southwestern border. The MATIC makes this assessment with high confidence based on substantial reporting and accounts from the DEA, DCI, and RMHIDTA.

(U//FOUO) According to the DEA, the vast majority of the meth, heroin, and opioids trafficked in Montana originates from Mexico.⁹ It is then smuggled through the southwestern border—mainly Arizona and California—and then transported to Montana through various west coast and Rocky Mountain states.¹⁰ The organizations primarily responsible for the production and smuggling of the meth, heroin, and opioids across the southwestern border (which eventually makes its way to Montana) is the Sinaloa Cartel and the Jalisco New Generation Cartel (CJNG).¹¹

(U//FOUO) In DCI Region 1, during the course of several meth, heroin, and fentanyl investigations, DCI assessed the following:

- (U//FOUO) In the majority of cases involving meth, heroin, and fentanyl, the originating sources of supply are directly associated with cartels operating both within Mexico and the United States. The most prevalent organization operating in the DCI Region 1 appears to be the Sinaloa Cartel. Throughout these cases, several Mexican nationals have been identified as sources of supply.¹²
- (U//FOUO) Ongoing trends for drug sources of supply varies to some degree based on the drug type. Drugs such as meth, cocaine, heroin, fentanyl, and counterfeit pharmaceuticals, which require a clandestine laboratory for production have traditionally been exported out of Mexico. Although meth labs still operate in Montana, they are proportionately much smaller and can be as simple as a single self-contained reaction vessel, which produces one-time personal use amounts.¹³

(U//FOUO) In DCI Region 2, during the course of several meth, heroin, and fentanyl investigations, DCI assessed the following:

- (U//FOUO) The sources of these three drugs are associated with the Mexican cartels operating in Mexico and the United States. Mexican cartel associates travel within region, dropping off several pound quantities of meth, heroin, fentanyl, and recently pills identified as OxyContin pills, but laced with fentanyl from a pill press. The Mexican cartels deliver these drugs to citizens in Montana who then distribute the drugs in the bigger cities and branching out to the smaller communities and reservations.¹⁴
- (U//FOUO) A new trend is counterfeit pills containing fentanyl that are made to resemble prescription pills. Most of these pills are believed to be manufactured in Mexico and smuggled across the Mexican border and either transported by vehicle or disguised and sent by parcel services.¹⁵

(U//FOUO) In DCI Region 3, during the course of several meth, heroin, and fentanyl investigations, DCI assessed the following:

- (U//FOUO) The majority of drugs appear to being trafficked from California, Nevada, Utah, and Washington. The origin sometimes depends on the method of transportation.¹⁶
- (U//FOUO) The existence and use of clandestine laboratories for producing drugs in the region has significantly declined over the years. Region 3 only investigates a minimal number of clandestine labs. This is a direct result of Federal drug initiatives as well as drugs being manufactured in other countries on a large-scale and subsequently imported into the United

States (and Montana). This has directly affected Montana's prices, amounts, and the quality of the drugs. Overall, the prices of meth and heroin are cheaper, available in larger amounts, and contain higher purity levels.¹⁷

- (U//FOUO) The Covid-19 pandemic initially created drug shortages in the region which resulted in price increases. Drug supply levels have since returned to 2019 levels while prices remain elevated. Drug prices vary from town-to-town, depending on their location along, and any disruptions to, the supply chain.¹⁸

(U//FOUO) In DCI Region 4, during the course of several meth, heroin, and fentanyl investigations, DCI assessed the following:

- (U//FOUO) The sources of drugs vary. Montana residents are known to travel to other states to acquire large amounts of drugs for redistribution, yet drug traffickers from other states also seek to develop networks in the state where they can capitalize on the higher prices and larger profits Montana offers in the illegal drug trade.¹⁹
- (U//FOUO) Over the past two years in Miles City, dealers and users have been observed shifting to other cities such as Billings, Sidney, and Williston, North Dakota to purchase meth or heroin whenever a shortage occurs. But when drugs are readily available in Miles City, users will often acquire them through the commission of property crimes.²⁰
- (U//FOUO) One specific case involved a Billings female escort in Las Vegas. The escort would engage in human trafficking while in Las Vegas to pay for multiple pounds of meth to later distribute in Miles City, Billings, and North Dakota. Another case involved a social media investigation where the suspect claimed to deliver for Colorado cartel gang members. A third case from 2021 involved a suspect living in Sidney, Montana who traded firearms and money for pound level quantities of meth in Colorado. Subsequent interviews with this suspect reported the distributor in Colorado was an active gang member.²¹
- (U//FOUO) Almost all large-scale dealers in Region 4 have a criminal history involving dangerous drugs, and approximately half were either on probation or released from probation within the last year of investigation. The main location for acquiring dangerous drugs for redistribution is Las Vegas, Nevada. Other states have included California, Oregon, Washington, North Dakota, and Colorado.²²

(U) TRANSNATIONAL CRIMINAL ORGANIZATIONS IN MONTANA

(U//FOUO) The MATIC assess it is nearly certain that TCOs have an intermittent presence in Montana but pose a low threat to Montana communities. The MATIC further assesses it is nearly certain that TCOs rely heavily on regional and local DTOs to traffic narcotics within the state on their behalf. The MATIC makes this assessment with high confidence based on reporting from RMHIDTA, DCI, and DEA.

(U) In their August 2020 report, RMHIDTA assessed that international DTOs (referred to as TCOs in this report) directly pose the lowest threat to communities throughout Montana. They assessed that these

organizations are complicit in smuggling the high volumes of illicit opioids and stimulants, primarily methamphetamine, into and throughout the state by exploiting the interstate highway system. However, the low number of international DTOs investigated in Montana indicates their threat within the state is lower than multi-state or local organizations. They further noted that Montana RMHIDTA task forces fluctuated year-to-year on the number of international DTOs they investigate, ranging from zero to two international DTOs every year within the last five years. This made it difficult to compare trends regarding international DTOs investigated in Montana.²³

(U//FOUO) DCI reporting on TCOs in Montana is consistent with reporting from RMHIDTA. In DCI Region 1, DCI assessed the following:

- (U//FOUO) The most prevalent organization operating appears to be the Sinaloa Cartel. Throughout DCI's investigations, several Mexican nationals have been identified as the supply sources. These suspects have entered the United States through border crossings and maintained travel documents. Although they have direct relationships with cartel members within Mexico and the United States, their status within these organizations is difficult to determine. Some have acted as arbitrators between cartels and regional DTOs, where they set up drug transactions, recruit members, and manage the collection and transfer of currency out of Montana. These suspects rely heavily on assistance and support from the local DTOs.²⁴
- (U//FOUO) Through various conspiracies involving cartel-directed networking, multiple large scale DTOs have established a presence Montana. The bulk of the distribution and currency transactions may be managed or directed by cartels but seem to be conducted by regional and local groups within the state.²⁵
- (U//FOUO) Regarding pharmaceutical drugs, local individuals and some loosely linked groups supply the majority of legitimate pharmaceuticals which are obtained through various diversion methods.²⁶

(U//FOUO) In DCI Region 2, DCI assessed the following:

- (U//FOUO) Mexican TCOs deliver narcotics to Montana residents who then distribute the drugs locally. However, delivery from cartel associates to Montana is not the only way these drugs arrive in the region. Local residents travel to Colorado, Utah, California, Nevada, and Washington to meet with the Mexican cartel associates to purchase the drugs for a cheaper price and then transport the drugs back to Montana by vehicle or through parcel services.²⁷

(U//FOUO) In DCI Region 4, DCI assessed the following:

- (U//FOUO) Local residents commonly travel out of state to California, Colorado, Nevada, Oregon, and Washington to acquire bulk amounts of meth and heroin for redistribution in Montana. Some suppliers in other states are known or suspected gang members and part of organized crime in their respective areas.²⁸

(U//FOUO) Due to Montana's rurality and location along the U.S.-Canadian border, possible links to drug smuggling and subsequent distribution from outside the United States is of concern. While Montana has experienced past incidents involving illegal aliens²⁹ and human smuggling,^{30,31,32} the nexus between the

two is not typically witnessed nor dealt with by Montana law enforcement. However, the MATIC is aware of drug trafficking incidents involving Mexican nationals.

- (U) In October 2018, a Mexican national and resident of Washington was sentenced to 70 months in prison for meth trafficking and money laundering. The suspect was a DTO member who had been trafficking meth from Washington to a local Billings-area distributor in 2016.³³
- (U) In April 2019, an individual from California was sentenced to 18 months in prison and two years of supervised release after Toole County Sheriff's Office deputies stopped the suspect for speeding and ultimately found a mustard-covered package of meth that was hidden in a cooler in October 2015. The suspect provided a Mexican voter registration card but had no valid driver's license, registration or insurance for the car.³⁴
- (U) In May 2019, a Mexican citizen was sentenced to 57 months in prison and five years of supervised release for possession with intent to distribute meth. Law enforcement had seized 34 pounds of meth, worth an estimated \$1.5 million, from a Billings hotel room.³⁵

(U) DRUG PURITY LEVELS IN MONTANA

(U//FOUO) Drug purity issues pertain mainly to meth, heroin, and cocaine. The MATIC assesses it is nearly certain that the purity of meth in Montana is at least 95 percent and has recently increased to 96-99 percent purity in certain areas, while the purity of heroin and cocaine likely varies, as these two drugs are not always tested for purity. The MATIC makes this assessment with high confidence based on reporting from DCI and DEA.

(U//FOUO) DCI Narcotics Bureau investigations at the state level require the drug evidence to be sent to the Montana State Crime Lab where the drug is identified and given a quantitative weight. While federal prosecutions require drug evidence to be sent to the DEA lab.³⁶ The DEA lab, unlike the Montana State Crime Lab, conducts both a quantitative and qualitative test. As a result of this analysis, samples tested have consistently shown a high purity level which translates to potency.³⁷

(U//FOUO) In DCI Region 1, DCI assessed the following:

- (U//FOUO) Meth samples have consistently tested at 95 percent or higher purity. This level of purity indicates the drugs are produced in large scale facilities most likely operating inside Mexico, it also points to the existence of direct supply routes to Montana where the drugs are not tampered with or diluted while in transport.³⁸
- (U//FOUO) In the last three years, the purity and consistency of meth seized has remained relatively high. One aspect of drug investigations which has shown an increase is the larger amounts of dangerous drugs being distributed. In the past three years, transactional amounts have increased from multiple ounce investigations to pounds.³⁹

(U//FOUO) In DCI Region 3, DCI assessed the following:

- (U//FOUO) The amounts of meth and heroin trafficked into Region 3 appear to be in larger quantities and have a high level of purity.⁴⁰

(U//FOUO) In DCI Region 4, DCI assessed the following:

- (U//FOUO) Approximately five years ago, purity levels increased to all-time highs. Purity rates are typically between 96-99 percent and it is rare if the region sees purity lower than mid-to-high 90s. This does not account for cases where Montana dealers used cutting agents to increase their redistribution volume which has been found in three cases within the last year.⁴¹

(U) According to the DEA, heroin and cocaine purity is not always known, as they typically only test for the drugs and not their purity. Historically, DEA has seen heroin cut to below 50 percent purity, as with cocaine.⁴² Retail level heroin distributors have mixed or “cut” heroin with adulterants such as caffeine, procaine, and lidocaine, which increased their profits but also decreased the purity of their product. Analysis by the DEA indicates that heroin mixed with other controlled substances, mostly fentanyl, is increasingly widespread at the retail level. Nationally, the domestic market for fentanyl overlaps with most of the major white powder heroin markets. However, in select areas, law enforcement and public health officials report fentanyl is either supplanting or has surpassed a significant portion of the pre-established heroin market. Adding fentanyl to heroin allows distributors to greatly increase their profits while maintaining product quality.⁴³

(U) ASSOCIATED COSTS WITH DRUG ENFORCEMENT

(U//FOUO) The financial costs of enforcing drug laws and combatting drug related crime have increased overall for the DCI Narcotics Bureau, although the exact amount has not been determined. Reasons for these cost increases include extra hours and resources required to conduct drug investigations which involve tracing drugs with out-of-state origins, a rise in the number of DTOs operating in Montana, a lack of grant funding matches, and increases in quantities purchased during drug investigations.

(U//FOUO) In DCI Region 1, DCI reported the following:

- (U//FOUO) Costs related to operations and personnel have increased over the last three years when accounting for the hours and resources needed to conduct narcotics investigations. DCI Agents often conduct high level investigations involving drugs with out-of-state origins, and the resources required to identify those origins taxes already limited resources. However, in doing so, DCI is able to divert large shipments of dangerous drugs away from Montana.⁴⁴
- (U//FOUO) Costs related to operational purchases has for the most part decreased, which can be attributed to economic factors as well as a more direct relationships between local DTOs and supply sources. The cost of a pound per gram of meth is more profitable than an ounce per gram, so the more weight that a local DTO can directly purchase from a distribution source, the lower the overall cost burden.⁴⁵

(U//FOUO) In DCI Region 3, DCI reported the following:

- (U//FOUO) Costs of operational purchases have dropped due to economic forces. At the same time, the presence of DTOs in the region continues to rise. As their presence increases, so do the number of hours and investigative resources required to identify the DTO members operating to determine their positions within their organizations.⁴⁶

(U//FOUO) In DCI Region 4, DCI reported the following:

- (U//FOUO) The costs associated with drug enforcement has increased dramatically over time, to the point the local task force is spending approximately \$40,000 more annually than what the Region receives in grants and matching funds from other law enforcement partners.⁴⁷
- (U//FOUO) Operational drug purchases involve increasingly larger quantities each year, which has translated to consistently larger caseloads since 2018. Equipment and overhead costs have also increased.⁴⁸
- (U//FOUO) DCI no longer has civil forfeiture options available at the state level, which has limited their capabilities in seizing and utilizing criminal assets such as vehicles, firearms, or currency directly tied to the distribution of dangerous drugs.⁴⁹

(U) OUTLOOK

(U//FOUO) Law enforcement agencies throughout the state will likely encounter increased drug trafficking incidents, overdoses, and related violent crimes. Any drug shortages brought on by the COVID-19 pandemic have since recovered while drug prices remain elevated, and these market conditions will likely motivate TCOs and local DTOs to expand their operations in the state, particularly with meth. In order to meet demand, TCOs will probably increase meth shipments to Montana due to their abilities to manufacture meth at lower costs, higher purities, and higher potencies. Because of this, the MATIC assesses that meth will very likely remain the most significant drug threat, followed by fentanyl, then heroin, pharmaceuticals, and cocaine. However, the emerging threat of fentanyl and counterfeit pills containing fentanyl is very likely a warning sign for what Montana communities and law enforcement agencies should expect in the coming years.

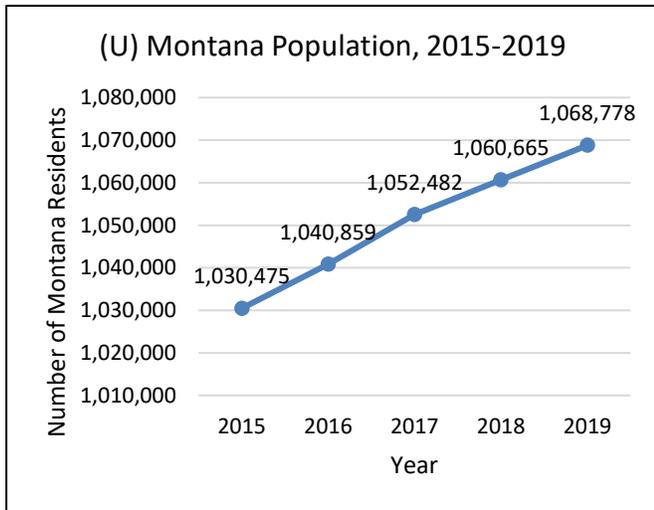
(U) APPENDIX A: EXPRESSIONS OF LIKELIHOOD OR PROBABILITY

Terms of Likelihood	Almost No Chance	Very Unlikely	Unlikely	Roughly Even Chance	Likely	Very Likely	Almost Certain(ly)
Terms of Probability	Remote	Highly Improbable	Improbable (Improbably)	Roughly Even Odds	Probable (Probably)	Highly Probable	Nearly Certain
	1-5%	5-20%	20-45%	45-55%	55-80%	80-95%	95-99%

(U) APPENDIX B: CONFIDENCE INTERVALS REGARDING ANALYTICAL JUDGMENTS

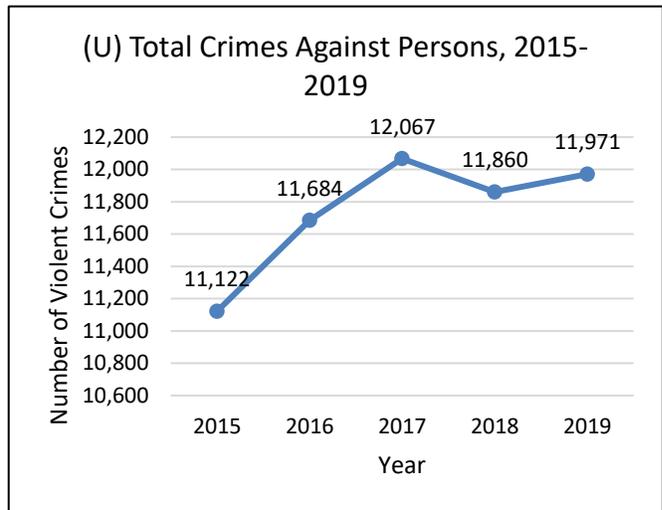
(U) High confidence generally indicates judgments based on high-quality information and/or the nature of the issue makes it possible to render a solid judgment. Medium confidence generally means there are various ways to interpret the information, we have alternate views, or the information is credible and plausible but not corroborated sufficiently. Low confidence generally means the information is scant, questionable or very fragmented, making it difficult to make solid analytic inferences.

(U) APPENDIX C: CHARTS AND TABLES



2015	2016	2017	2018	2019	Average % Change	% Change 2015-2019
-	1.0%	1.1%	0.8%	0.8%	3.7%	3.7%

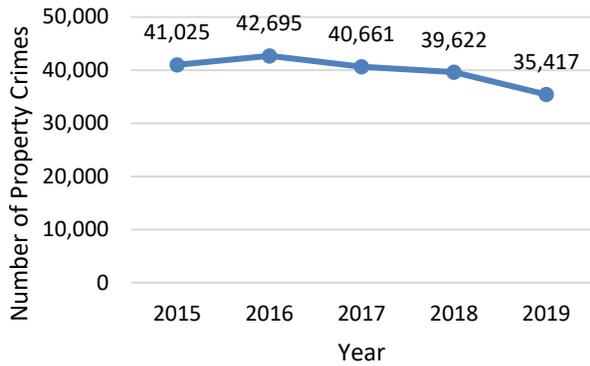
(U) Source – Census.gov; Accessed on 04 March 2021



2015	2016	2017	2018	2019	Average % Change	% Change 2015-2019
-	5.1%	3.3%	-1.7%	0.9%	7.6%	7.6%

(U) Source – Montana Board of Crime Control; Accessed on 26 February 2021

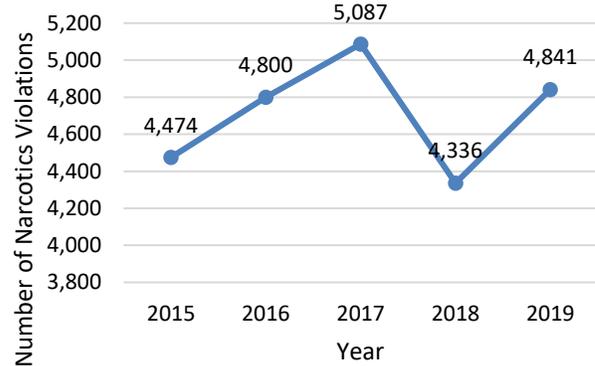
(U) Total Crimes Against Property in Montana, 2015-2019



2015	2016	2017	2018	2019	Average % Change	% Change 2015-2019
-	4.1%	-4.8%	-2.6%	-10.6%	-13.9%	-13.7%

(U) Source – Montana Board of Crime Control; Accessed on 26 February 2021

(U) Total Narcotics Violations in Montana, 2015-2019



2015	2016	2017	2018	2019	Average % Change	% Change 2015-2019
-	7.3%	6.0%	-14.8%	11.6%	10.1%	8.2%

(U) Source – Montana Board of Crime Control; Accessed on 26 February 2021

(U) Montana Felony Drug Arrests, 2015-2019

	Meth	Heroin	Marijuana	Cocaine	Pharmaceuticals	Fentanyl
2015	413	26	47	7	85	N/A
2016	447	76	46	14	72	N/A
2017	469	96	30	14	75	N/A
2018	404	69	16	26	42	N/A
2019	372	53	20	11	17	N/A

(U) Source – RMHIDTA, August 2020. Accessed on 05 March 2021.

(U) Montana Drug Seizures (lbs./DU), 2015-2019

	Meth	Heroin	Marijuana	Cocaine and Crack	Pharmaceuticals (DU)	Fentanyl (DU)
2015	127.93	13.63	202.60	90.62	7,266.00	*
2016	97.55	4.20	1,471.08	149.45	5,551.00	75.00
2017	188.17	4.05	240.18	4.00	4,910.00	11.00
2018	187.22	9.22	230.86	7.35	6,095.00	496.00
2019	250.04	6.87	223.13	9.04	20,220.00	358.00

(U) Source – RMHIDTA, August 2020. Accessed on 05 March 2021.

(U) Montana Drug Overdoses, 2015-2019							
	Meth	Heroin	Marijuana	Cocaine	Opioids	Pharmaceuticals/Benzodiazepines	Fentanyl/Synthetic Narcotics
2015	32	5	0	0	23	6	7
2016	21	5	0	1	11	4	10
2017	24	7	0	0	18	9	6
2018	30	20	0	2	21	9	12
2019	58	23	0	5	25	19	16

(U) Source – RMHIDTA, August 2020. Accessed on 05 March 2021.

(U) APPENDIX D: MBCC CRIME CATEGORIES AND UCR CODES

(U) Crimes against persons and NIBRS codes

- (U) Aggravated Assault (13A)
- (U) Human Trafficking, Commercial Sex Acts (64A)
- (U) Intimidation (13C)
- (U) Kidnapping/Abduction (100)
- (U) Murder and Nonnegligent Homicide (09A)
- (U) Negligent Manslaughter (09B)
- (U) Sex Offense - Forcible (110)
- (U) Sex Offenses - Nonforcible (360)
- (U) Simple Assault (13B)

(U) Crimes against property definitions and Uniform Crime Reporting codes

- (U) All Other Larceny (23H)
- (U) Arson (200)
- (U) Bribery (510)
- (U) Burglary/Breaking & Entering (220)
- (U) Counterfeiting/Forgery (250)
- (U) Credit Card/Automatic Teller Fraud (26B)
- (U) Destruction/Damage/Vandalism of Property (290)
- (U) Embezzlement (270)
- (U) Extortion/Blackmail (210)
- (U) False Pretenses/Swindle/Confidence Game (26A)
- (U) Identity Theft (26F)
- (U) Impersonation (26C)
- (U) Motor Vehicle Theft (240)
- (U) Pocket-picking (23A)
- (U) Purse-snatching (23B)
- (U) Robbery (120)
- (U) Shoplifting (23C)
- (U) Stolen Property Offenses (280)
- (U) Theft From Building (23D)

- (U) Theft From Coin Operated Machine (23E)
- (U) Theft From Motor Vehicle (23F)
- (U) Theft of Motor Vehicle Parts/Accessories (23G)
- (U) Welfare Fraud (26D)
- (U) Wire Fraud (26E)

//END//

(U) Sources

¹ (U); U.S. Census Bureau; County Population Totals; co-est2019-annres-30.xlsx; <https://www.census.gov/data/datasets/time-series/demo/popest/2010s-counties-total.html>; accessed on 03 MAR 2021; DOI 01 JUL 2019; (U); Annual Estimates of the Resident Population for Counties: April 1, 2010 to July 1, 2019; Extracted information is U; Overall record classification is (U); Source is the U.S. authority on demographics data.

² (U); Montana Board of Crime Control. Montana Incident Based Reporting System; accessed on 26 FEB 2021; DOI 26 FEB 2021; (U); National Incident Based Reporting System (NIBRS) Reported Criminal Offenses By County 2015-2019; Extracted Information is U; Overall record classification is (U); Source is the clearinghouse for Montana crime statistics.

³ (U); Montana Board of Crime Control. Montana Incident Based Reporting System; accessed on 26 FEB 2021; DOI 26 FEB 2021; (U); National Incident Based Reporting System (NIBRS) Reported Criminal Offenses By County 2015-2019; Extracted Information is U; Overall record classification is (U); Source is the clearinghouse for Montana crime statistics.

⁴ (U); Rocky Mountain High Intensity Drug Trafficking Area; Statewide narcotics assessment; AUG 2020; (U); "Rocky Mountain HIDTA 2020 Montana State Assessment"; Extracted information U; Overall document classification is U//LES.

⁵ (U//FOUO); Montana Department of Justice, Division of Criminal Investigation, Narcotics Bureau; Drug trends report; "Montana DCI Current Drug Trends"; Extracted information is U//FOUO; Overall document classification is U//FOUO.

⁶ Ibid.

⁷ Ibid.

⁸ Ibid.

⁹ (U//FOUO); U.S. Drug Enforcement Administration Drug Analyst; Email; 01 MAR 2021; DOI 01 MAR 2021; Nexus Between Illegal Aliens and Drug Crime in Montana; Extracted information is U//FOUO; Overall document classification is U//FOUO.

¹⁰ Ibid.

¹¹ Ibid.

¹² (U//FOUO); Montana Department of Justice, Division of Criminal Investigation, Narcotics Bureau; Drug trends report; "Montana DCI Current Drug Trends"; Extracted information is U//FOUO; Overall document classification is U//FOUO.

¹³ Ibid.

¹⁴ Ibid.

¹⁵ Ibid.

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¹⁸ Ibid.

¹⁹ Ibid.

²⁰ Ibid.

²¹ Ibid.

²² Ibid.

²³ (U); Rocky Mountain High Intensity Drug Trafficking Area; Statewide narcotics assessment; AUG 2020; (U); "Rocky Mountain HIDTA 2020 Montana State Assessment"; Extracted information U; Overall document classification is U//LES.

²⁴ Ibid.

²⁵ Ibid.

²⁶ Ibid.

²⁷ Ibid.

²⁸ Ibid.

²⁹ (U); U.S. Department of Justice-U.S. Attorney's Office, District of Montana; "Mexican Man Sentenced to Federal Prison for Illegal Reentry"; 06 JUN 2018; <https://www.justice.gov/usao-mt/pr/mexican-man-sentenced-federal-prison-illegal-reentry>; accessed on 05 MAR 2021; (U).

³⁰ (U); U.S. Department of Justice-U.S. Attorney's Office, District of Montana; "Mexican citizen admits illegally transporting aliens from Canada into Montana"; 10 DEC 2019; <https://www.justice.gov/usao-mt/pr/mexican-citizen-admits-illegally-transporting-aliens-canada-montana>; accessed on 05 MAR 2021; (U).

³¹ (U); U.S. Department of Justice-U.S. Attorney's Office, District of Montana; "Two Mexican citizens admit roles in transporting aliens from Canada into Montana"; 05 FEB 2020; <https://www.justice.gov/usao-mt/pr/two-mexican-citizens-admit-roles-transporting-aliens-canada-montana>; accessed on 05 MAR 2021; (U).

³² (U); U.S. Department of Justice-U.S. Attorney's Office, District of Montana; "Five Mexican Citizens Charged After Arrest in Investigation into Suspected Alien Smuggling in Glacier County"; 21 NOV 2019; <https://www.justice.gov/usao-mt/pr/five-mexican-citizens-charged-after-arrest-investigation-suspected-alien-smuggling>; accessed on 05 MAR 2021; (U).

³³ (U); U.S. Department of Justice-U.S. Attorney's Office, District of Montana; "Mexican National Sentenced to Years in Federal Prison For Methamphetamine Trafficking and Money Laundering"; 24 OCT 2018; <https://www.justice.gov/usao-mt/pr/mexican-national-sentenced-years-federal-prison-methamphetamine-trafficking-and-money>; accessed on 05 MAR 2021; (U).

³⁴ (U); U.S. Department of Justice-U.S. Attorney's Office, District of Montana; "California woman convicted in meth case sentenced to 18 months in prison"; 19 APR 2019; <https://www.justice.gov/usao-mt/pr/california-woman-convicted-meth-case-sentenced-18-months-prison>; accessed on 05 MAR 2021; (U).

³⁵ (U); U.S. Department of Justice-U.S. Attorney's Office, District of Montana; "Mexican citizen sentenced in Billings drug case in which agents seized 34 pounds of meth"; 17 MAY 2019; <https://www.justice.gov/usao-mt/pr/mexican-citizen-sentenced-billings-drug-case-which-agents-seized-34-pounds-meth>; accessed on 05 MAR 2021; (U).

³⁶ (U//FOUO); Montana Department of Justice, Division of Criminal Investigation, Narcotics Bureau; Drug trends report; "Montana DCI Current Drug Trends"; Extracted information is U//FOUO; Overall document classification is U//FOUO.

³⁷ Ibid.

³⁸ Ibid.

³⁹ Ibid.

⁴⁰ Ibid.

⁴¹ Ibid.

⁴² Stacy

⁴³ (U); U.S. Drug Enforcement Administration; "2020 National Drug Threat Assessment"; 02 MAR 2021; pg. 9; (U);

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⁴⁵ Ibid.

⁴⁶ Ibid.

⁴⁷ Ibid.

⁴⁸ Ibid.

⁴⁹ Ibid.

EXHIBIT Q

From: Mark Lamb
Sent: Tuesday, March 30, 2021 8:09 PM
To: Kredit, Joshua
Subject: Re: FW: Supplemental Declaration for Lamb

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

State of Arizona; State of Montana; and
Mark Brnovich, in his official capacity as
Attorney General of Arizona,
Plaintiffs,
v.
United States Department of Homeland
Security; United States of America;
Alejandro Mayorkas, in his official
capacity as Secretary of Homeland
Security; Troy Miller, in his official
capacity as Acting Commissioner of
United States Customs and Border
Protection; Tae Johnson, in his official
capacity as Acting Director of United
States Immigration and Customs
Enforcement; and Tracy Renaud, in her
official capacity as Acting Director of U.S.
Citizenship and Immigration Services,
Defendants.

Case No: 2:21-cv-00186-SRB

**SUPPLEMENTAL DECLARATION OF
MARK LAMB**

I, Mark Lamb, declare as follows:

1. I am competent to testify as to the matters contained herein and make this declaration based on my own personal and professional knowledge, law enforcement expertise, and the information available to me in my positions in public service.
2. I currently serve as Sheriff of Pinal County, Arizona, and have been a law enforcement officer for over 14 years.
3. On or about March 9, 2021, my staff conducted a review of records regarding inmates then in Pinal County's custody and found as follows:
4. Pinal County on average has around 35 inmates in custody who have ICE Detainers, costing the county an estimated \$ 208,845 annually. Currently, we have 31 such inmates in our jails out of a total population in custody of 592.
5. The 31 inmates in custody with ICE Detainers at the time of review have 41 violations of state law pending against them. This includes. Assault, Disorderly Conduct, Crimes against Children, Domestic Violence, Assault with a Deadly Weapon, Possession of Drugs, Possession of Drugs with intent to Distribute, DUI, and Possession of Deadly Weapon. This is fairly representative of the charges such populations have at any given time in custody in our jails.
6. An examination of the criminal history files of the inmates in custody with an ICE Detainer for 2019 shows that these individuals have a recidivism rate (indicated by prior jail time) of approximately 53% for that population.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, and that this declaration was issued on March [[day]], 2021, in [[city]], Arizona.


Mark Lamb
Sheriff